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Attorneys for Plaintiff JENS ERIK SORESENSEN,
as Trustee of SORESENSEN RESEARCH AND
DEVELOPMENT TRUST

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

JENS ERIK SORESENSEN, as Trustee of)	Case No. C08-000096 CW
SORESENSEN RESEARCH AND)	
DEVELOPMENT TRUST,)	EX PARTE APPLICATION TO
)	VACATE OR CONTINUE CASE
Plaintiff)	MANAGEMENT CONFERENCE
v.)	SET FOR AUGUST 26, 2008
)	
AMPRO TOOLS CORPORATION, a)	
California Corporation; and DOES 1 –)	Date: August 26, 2008
100,)	Time: 2:00 p.m.
)	Judge Claudia Wilken
Defendants.)	
)	
)	

1 Plaintiff JENS E. SORENSEN, as TRUSTEE OF THE SORENSEN
2 RESEARCH AND DEVELOPMENT TRUST ("SRDT"), hereby applies, *ex parte*,
3 for an Order vacating or continuing the date of the Case Management Conference
4 ("CMC"), which is currently scheduled for August 26, 2008, for the following
5 reasons:

6 1. Default has already been entered against Defendant in this case (Docket
7 #12);

8 2. Plaintiff is finalizing a new motion for default judgment that should be
9 filed with the Court today or tomorrow (Magistrate Judge Brazil requested a more
10 detailed motion at Docket #21); and

11 3. No case management beyond the setting of a date for the renewed
12 motion for default is necessary at this stage in the case.

13 If a CMC is still required by the Court, Plaintiff's counsel respectfully
14 requests leave to appear by telephone.

15 This request is based upon the court file in this case as referenced above.

16 DATED this Thursday, August 21, 2008.

17
18 JENS ERIK SORENSEN, as Trustee of
19 SORENSEN RESEARCH AND DEVELOPMENT
20 TRUST, Plaintiff

21 /s/ Melody A. Kramer

22 Melody A. Kramer, Esq.

23 J. Michael Kaler, Esq.

24 Attorney for Plaintiff
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PROOF OF SERVICE

I, Melody A. Kramer declare: I am and was at the time of this service working within in the County of San Diego, California. I am over the age of 18 year and not a party to the within action. My business address is the Kramer Law Office, Inc., 9930 Mesa Rim Road, Suite 1600, San Diego, California, 92121. I am a member of the State Bar of California and the Bar of this Court.

On August 21, 2008, I served on the parties to this action the following documents:

***EX PARTE APPLICATION TO VACATE OR CONTINUE CASE MANAGEMENT
CONFERENCE SET FOR AUGUST 26, 2008***

PERSON(S) SERVED	PARTY(IES) SERVED	METHOD OF SERVICE
Celia Chu 1108 Elmsford Drive Cupertino, CA 95014	Agent for Service of Process for AmPro Tools Corporation	Federal Express
Bruce Kaser Vantage Law PLLC 355 N.W. Gilman Blvd. Suite 203 Issaquah, WA 98027	Attorney for AmPro Tools Corporation (no appearance made in this case; probably not authorized to appear in California courts)	Federal Express

☒ (Federal Express) I deposited or caused to be deposited today with Federal Express in a sealed envelope containing a true copy of the foregoing documents with fees fully prepaid addressed to the above noted addressee for overnight delivery.

I declare that the foregoing is true and correct, and that this declaration was executed on Thursday, August 21, 2008, in San Diego, California.

/s/ Melody A. Kramer

Melody A. Kramer